

I, Kent Ashley, hereby declare as follows:

1. I am currently a Senior Group Manager for the Merchandise, Presentation, and Development Division at Target Corporation ("Target"). I make this declaration based on my personal knowledge, and, to the extent that I do not have personal knowledge, I have relied on others to gather relevant information.

2. I have served as a Business Analyst, Merchandise Planning Manager, Buyer, Senior Buyer, and Senior Group Manager during my tenure at Target (June 2001 to present).

3. I previously testified in this action regarding Target's practices for purchasing and acquiring CRT televisions ("CRT Products"). I served as a Buyer in the Home Electronics Department at Target from approximately February 2008 to December 2009. In that role, I was responsible for Target's CRT Product procurement. My role as a Home Electronics Buyer mirrored that of my predecessors, as Home Electronics Buyers used the same substantive CRT Product procurement practices and procedures. This is true during the Relevant Period of 1995 through 2007.

4. During the Relevant Period, Target made its purchases of CRT Products exclusively from its offices in Minneapolis, Minnesota.

5. During the Relevant Period, Target purchased CRT Products directly from Defendants, co-conspirators and their affiliates, all of which were located in the United States.

6. During the Relevant Period, Target's vendors, including the Defendants, co-conspirators, and their affiliates, shipped these CRT Products exclusively to Target's distribution centers in the United States.

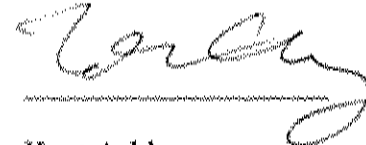
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I declare under penalty of perjury that the foregoing is true and correct.

Executed this 17th day of December, 2014 at Minneapolis, Minnesota.



Kent Ashley